



CITATION

ADDIE AGBASI

VS

WALMART INC

DOCKET NUMBER: C-20213788

SEC: CV4

STATE OF LOUISIANA

PARISH OF OUACHITA

**FOURTH JUDICIAL DISTRICT
COURT**

TO:

WALMART INC
THROUGH ITS AGENT FOR SERVICE OF PROCESS: CT CORPORATION
SYSTEM
3867 PLAZA TOWER DRIVE
BATON ROUGE, LA 70816

~~OUACHITA PARISH~~
East Baton Rouge

YOU HAVE BEEN SUED.

Attached to this Citation is a certified copy of the Petition. The petition tells you what you are being sued for.

You must **EITHER** do what the petition asks, **OR**, within **FIFTEEN (15) days** after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Ouachita Parish Court House, 301 South Grand, Monroe, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within **FIFTEEN (15) days**, a judgment may be entered against you without further notice.

This Citation was issued by the Clerk of Court for Ouachita Parish, on this **DECEMBER 22, 2021**.

OUACHITA PARISH CLERK OF COURT

Also attached are the following:
PETITION FOR DAMAGES



DEPUTY CLERK OF COURT

FILED BY: BARBARAABB H. HOLLADAY #39215

TRUE COPY



Ouachita Parish
Filed Dec 17, 2021 3:49 PM
Rene Tanner
Deputy Clerk of Court
C-20213788
CV4

STATE OF LOUISIANA ** PARISH OF OUACHITA
FOURTH JUDICIAL DISTRICT COURT

ADDIE AGBASI

FILED: _____

VERSUS NO. _____

WALMART INC.

DEPUTY CLERK OF COURT

PETITION FOR DAMAGES

The Petition of **ADDIE AGBASI** (hereinafter "**AGBASI**"), a major resident of Ouachita Parish, Louisiana, respectfully represent:

1.

Petitioner shows that he names as Defendant herein the following:

- a. **WALMART INC.** (hereinafter **WALMART**) a foreign corporation licensed to do and doing business within the state of Louisiana which has appointed as its agent for service of legal process C T Corporation System.

2.

Said Defendant is individually, jointly and solidarily liable to Plaintiff for the following causes and reasons to wit:

3.

Petitioner was utilizing services at a Walmart Neighborhood Market store located at 1840 McKeen Plaza, in Monroe, Ouachita Parish, Louisiana on January 4, 2021. Said Walmart Neighborhood Market location is owned and operated by Defendant, **WALMART**.

4.

While Petitioner was standing in line at the money center, located inside Walmart Neighborhood Market, an employee was proceeding to push along a dolly stacked upward with forty (40) carts.

5.

Suddenly and without warning, the Petitioner was struck in the back with dolly operated by Neighborhood Market Employees, resulting in pushing her forward. This collapse and/or fall by Petitioner, **AGBASI**, resulted in extreme pain and serious personal injuries.

6.



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Ouachita Parish
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Petitioner alleges that the acts of Defendants' employees improperly transported goods throughout the store, comprised a hazardous condition which reasonably might give rise to damage and also comprised a breach by the defendants to exercise reasonable care to keep their aisles, passageways and floors in a reasonably safe condition.

7.

Petitioner asserts that the negligent acts of the Defendants' employees were created and maintained by Defendants herein.

8.

This incident was the result of gross neglect on the part of Defendant WALMART and WALMART's employees in the following illustrative respects:

- a. In creating a hazardous condition which reasonably gave rise to damaging customers of the facility;
- b. Employees of Defendant were negligent for not posting or insuring the posting of other signs or warnings adequately placed to alert patrons of hazardous conditions on the floors, isles, and/or passageways;
- c. In failing to exercise reasonable care in keeping the aisles, passageways and floors in a reasonable safe condition for patrons using the facility; and
- d. In creating and permitting the continuous presence of a condition which caused serious damage to patrons using the facility.

9.

Petitioner further asserts that Defendant's employees and staff had actual or constructive notice of the hazardous condition which caused damages to Petitioners prior to the occurrence of the damage.

10.

Petitioner shows that as a result of the hereinabove described accident, Petitioner AGBASTI, suffered serious personal injuries. Petitioner shows that she is entitled to general and special damages as reasonable in the premises and itemizes the personal injury and damages which he sustained in this accident in the following particulars, to-wit:

- a. Pain and suffering (past, present and future);

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Garret Palmer



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- b. Disability (whether temporary or permanent);
- c. Mental anguish and distress (past, present and future);
- d. Medical expenses (past present and future);
- e. Loss of enjoyment of life (past, present and future);
- f. Loss of consortium;
- g. Lost wages (past, present and loss of future earning capacity); and
- h. Household Services.

11.

Petitioner shows that the Defendant, WALMART is truly and justly indebted unto her, in the amounts and sums as are reasonable in the premises with legal interest thereon from date of judicial demand until paid.

WHEREFORE, PETITIONER PRAYS that this Petition be duly filed and served on Defendant, and that after due proceedings had, there be Judgment herein in favor of Petitioner, ADDIE AGBASI, and against the Defendant, WALMART INC., in the amounts and sums as are reasonable in the premises with legal interest thereon from date of judicial demand until paid, penalties and for all costs of these proceedings.

WHEREFORE, PETITIONERS FURTHER PRAY for a trial by jury and full, general and equitable relief.

Respectfully submitted,



CHRISTIAN C. CREED, #23701
MICHAEL R. CREIGHTON, #29133
BARBARAANN H. HOLLADAY, #39215
ATTORNEY FOR PETITIONER
1805 Tower Drive
Monroe, Louisiana 71201
Telephone: (318) 362-0086
Facsimile: (318) 577-1555

PLEASE SEE NEXT PAGE FOR SERVICE INFORMATION

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PLEASE SERVE DEFENDANT AS FOLLOWS:

WALMART INC.
Through its Agent for Service of Process
C T Corporation System
3867 Plaza Tower Drive
Baton Rouge, Louisiana 70816

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David Palm



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STATE OF LOUISIANA

PARISH OF OUACHITA

VERIFICATION

Addie Agbasi declares:

she is the petitioner in the captioned matter. She is personally familiar with the facts giving rise to the matter herein. She has read the petition and the allegations of the same are true and correct to the best of her knowledge, information, and belief.


Addie Agbasi

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